

July 17, 2006

Carla Rosser, Independent Consultant  
Executive Regional Vice President  
Arbonne International

Federal Trade Commission  
Re: Business Opportunity Rule, R511993

To Whom It May Concern,

The purpose of this letter today is to express my personal concern about the proposed Business Opportunity Rule R511993.

Please allow me to tell you what becoming an Independent Arbonne Consultant has meant for me and my family over the past 6 years. If someone would have told me 6 years ago that I would be running a very successful business from my home I would never have believed it. I started this business as a scared consultant who couldn't speak in front of anyone and I have gained the skills and confidence needed to speak in front of hundreds when I am called upon. I must admit I first became a consultant because I fell in love with Arbonne's incredible products. However, since December of 1999 this business has become so much more to me and my family. In fact, just recently my husband thanked me for starting this business. You see my husband's job depends directly on the automotive industry in Michigan and my Arbonne business has truly helped us survive the ups and downs. During my 6 years with Arbonne I am proud to say that I have developed a team of hundreds of Consultants across the United States and together we are changing lives and enjoying better lives.

I believe that in its present form the Business Opportunity Rule R511993 could prevent me from continuing as an Arbonne Independent Consultant. Although, I welcome protection from unfair and deceptive acts or practices, I believe some of the proposed rules could make it impossible for me to sell my products and sponsor others into my business.

One of the sections of the proposal that I am most concerned with is the 7 day waiting period. A waiting period could give someone the idea that we are doing something in network marketing that is somehow deceptive therefore requiring them to give it much thought. When in reality the starter kit cost a nominal amount of money and network marketing is a no strings attached business. In addition, I believe it will be very difficult to keep track of when I have spoken with individuals about joining me in my business.

The success of my business has been based partly on the immediate results prospects experience with Arbonne products; as was the case of myself when I joined this company. The proposed waiting period could potentially limit my ability to grow my business.

The proposed rule also calls for the release of any information regarding lawsuits involving misrepresentations, or unfair or deceptive practices. What if the company is found innocent? Lawsuits may give the impression of wrongdoing. It does not seem fair to disclose potentially harmful information unless Arbonne is found guilty.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. This proposal causes me the greatest of concerns. In the world we live in today, identity theft is a reality. Having always run a professional business, I have always held my Consultants and prospects information in the strictest of confidence. I would be very uncomfortable sharing that information with or without their permission. In fact, I can't imagine anyone giving me permission to share their personal information with anyone. Again, I am greatly concerned about this proposed rule.

Please know that I truly appreciate the work of the FTC in protecting consumers. However, I believe the proposed new rule would have a devastating effect on millions of successful network markers who merely want to share our business and industry with others. It is my hope that you will hear our voices and help us by not restricting our ability to share our businesses freely.

Thank you for your time.

Sincerely,

Carla Rosser, Independent Consultant  
Executive Regional Vice President  
Arbonne International